## TCEQ DOCKET NO. 2015-1268-UIC

APPLICATION BY URI, INC. FOR	§	BEFORE THE
RENEWAL AND MAJOR	§	
AMENDMENT OF CLASS III	§	TEXAS COMMISSION ON
INJECTION WELL AREA PERMIT	§	
No. UR02827	8	ENVIRONMENTAL QUALITY

# APPLICANT'S SUPPLEMENTAL RESPONSE TO THE HEARING REQUEST OF LEONARDO RAMOS, JR.

Applicant URI, Inc. ("URI") files this, its Supplemental Response to the Hearing Request of Leonardo Ramos, Jr. ("Response"), pursuant to General Counsel's letter dated, September 16, 2015, 30 TAC § 55.209(d) and other applicable rules of the Texas Commission on Environmental Quality, and respectfully shows the following:

#### I. DISCUSSION

URI has reviewed the timely hearing request of Leonardo Ramos, Jr. whose address is listed as 580 N. County Road 1090, Kingsville, Texas 78363. This address is located in the Garcia Hill area. Mr. Ramos claims to have a water well and also claims that it has been affected by URI's mining in the area. As Mr. Ramos is similarly situated with other requesters recommended for party status, URI has no objection to his hearing request being granted and him being admitted as a party, subject to the same conditions and proof requirements as the other requesters.

Mr. Ramos' concerns regarding his groundwater well coincide with the other requests and are limited by the comments filed in this matter. Therefore URI advocates no change in the statement of the only issue in this case from its earlier filing.

#### II. CONCLUSION

URI does not object to Leonardo Ramos, Jr. being named as an affected person, subject to verification of the facts during discovery. URI advises that no alteration or addition to its previous statement of the single issue eligible for referral is warranted, and that no other issues should be referred. URI prays for any and all other relief to which it may show itself entitled.

Respectfully submitted,

LLOYD GOSSELINK ROCHELLE & TOWNSEND, P.C.

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By: DUNCAN C. NORTON

State Bar Number 15103950

ATTORNEY FOR URI, INC.

# URI, INC. DOCKET NO. 2015-1268-UIC; PERMIT NO. UR02827 CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's Response to Hearing Requests has been served on the following counsel/parties of record by electronic mail, certified mail (return receipt requested), regular U.S. Mail, facsimile transmission and/or hand delivery on this the 18th day of September, 2015.

Duncan C. Norton

#### FOR THE APPLICANT

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# FOR THE CHIEF CLERK:

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### **REQUESTER(S):**

See attached list.

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#### REQUESTER(S)

CANDELARIO Q BENAVENTE 383 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851

HERACLIO BENAVENTE 381 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851

MARIA DEL ROSARIO BENAVENTE 383 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851

SABINA BENAVENTE 381 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851

MARIE BIPPERT 679 E COUNTY ROAD 2160 KINGSVILLE TX 78363-2625

MARK M WALSH 3931 BOYD ST KINGSVILLE TX 78363-7420

BETO GARCIA 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

BLANCA GARCIA 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

FERMAN GARZA 424 N FM 2619 KINGSVILLE TX 78363-8933

JEANETTE CUMBERLAND HIX 2213 BRUN ST HOUSTON TX 77019-6507

NERIO MARTINEZ 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

OLGA MARTINEZ 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

DIANA B MEDINA 383 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851 WILL BIPPERT 679 E COUNTY ROAD 2160 KINGSVILLE TX 78363-2625

BRUCE C CUMBERLAND 11812 LINDEN GROVE DR FORT WAYNE IN 46845-1961

DALE CUMBERLAND 1421 SLEEPY HOLLOW LN NEW BRAUNFELS TX 78130-3341

ELIZABETH CUMBERLAND 761 MARTINDALE FALLS RD MARTINDALE TX 78655-2530

ELIZABETH CUMBERLAND PO BOX 537 MARTINDALE TX 78655-0537

RICHARD SCOTT MEDINA, SR 383 N COUNTY ROAD 1070 KINGSVILLE TX 78363-8851

CARLOS ORTEGON 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

CARLOS ORTEGON 426 GARCIA HILL RD KINGSVILLE TX 78363-8902

DANIEL ORTEGON 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

NORMA GARZA ORTEGON 418 GARCIA HILL RD KINGSVILLE TX 78363-8902

ALFONSO R RAMOS 2425 E FM 1717 KINGSVILLE TX 78363-8835

ELEUTERIO L SAENZ 148 E COUNTY ROAD 2170 KINGSVILLE TX 78363-2601 ROBERT DE LA ROSA 706 E FM 1118 KINGSVILLE TX 78363-2633

ROLANDO DE LA ROSA 706 E FM 1118 KINGSVILLE TX 78363-2633

DAVID FREDERICK LOWERRE FREDERICK PERALES ALLMON & ROCKWELL 707 RIO GRANDE ST STE 200 AUSTIN TX 78701-2733

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